

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION

GAYLA PRICE,

PLAINTIFF,

v.

GREENSBORO NEWS & RECORD,  
LLC, BH MEDIA GROUP, INC.,  
BERKSHIRE HATHAWAY, INC. and  
KELLY YOUNG,

DEFENDANTS.

)  
)  
) Case No. 1:19-cv-960-CCE-JEP  
)  
)

**ANSWER OF KELLY YOUNG ONLY  
TO AMENDED COMPLAINT**

COMES NOW the defendant, Kelly Young, only, answering the Amended Complaint,  
avers:

1. Denied for lack of knowledge or information.
2. Denied for lack of knowledge or information.
3. The allegations contained in paragraph 3 of the Complaint do not require a legal response, however to the extent one is required: denied.
4. The allegations contained in paragraph 4 of the Complaint do not require a legal response, however to the extent one is required: denied.
5. The allegations contained in paragraph 5 of the Complaint do not require a legal response, however to the extent one is required: denied.
6. The allegations contained in paragraph 6 of the Complaint do not require a legal response, however to the extent one is required: denied.
7. The allegations contained in paragraph 7 of the Complaint do not require a legal response, however to the extent one is required: denied.
8. As to the allegations contained in paragraph 8 of the Complaint, it is admitted that the plaintiff is a black female, citizen and resident of Guilford County and was employed by the Greensboro News & Record.

Except as herein admitted, denied for lack of knowledge or information.

9. Denied for lack of knowledge or information.

10. Denied for lack of knowledge or information.

11. Denied for lack of knowledge or information.

12. Denied for lack of knowledge or information.

13. As to the allegations contained in paragraph thirteen of the Complaint, it is admitted that defendant Kelly Young is a citizen and resident of the State of North Carolina, and was employed by the News & Record. It is further admitted that the defendant pled “No Contest” to a charge of indecent exposure.

14. Upon information and belief, admitted.

15. As to the allegations contained in paragraph 15 of the Complaint, it is admitted that this Court has jurisdiction over this action.

Except as herein admitted, denied.

16. Denied for lack of knowledge or information.

17. Admitted.

18. Denied for lack of knowledge or information.

19. Denied for lack of knowledge or information.

20. Denied for lack of knowledge or information.

21. Denied for lack of knowledge or information.

22. Denied for lack of knowledge or information.

23. Denied for lack of knowledge or information.

24. As to the allegations contained in paragraph 24 of the Complaint, it is admitted that defendant Young worked with the plaintiff.

Except as herein admitted, denied.

25. Denied for lack of knowledge or information.

26. Denied for lack of knowledge or information.

27. Denied for lack of knowledge or information.

28. Denied for lack of knowledge or information.

29. Denied for lack of knowledge or information.

30. Denied for lack of knowledge or information.

31. Denied for lack of knowledge or information.

32. Denied for lack of knowledge or information.

33. Denied for lack of knowledge or information.

34. The defendant invokes the Fifth Amendment with respect to the allegations against him.

Except as herein admitted, denied for lack of knowledge or information.

35. Defendant Young invokes the Fifth Amendment with respect to the allegations against him.

Except as herein admitted, denied for lack of knowledge or information.

36. Defendant Young invokes the Fifth Amendment with respect to the allegations against him.

Except as herein admitted, denied for lack of knowledge or information.

37. Denied.

38. Denied.

39. Denied.

40. Denied.

41. Denied.

42. As to the allegations contained in paragraph 42 of the Complaint, it is admitted that the defendant served as pray leader, was captain of the kick ball team and had received an award for his editorial design work.

Except as herein admitted, denied for lack of knowledge or information.

43. Denied.

44. Denied.

45. The defendant moves, pursuant to Rule 12(f) of the Federal Rules of Civil Procedure, to strike the allegations contained in paragraph 45 of the Complaint.

Subject to and without waiving this motion, the defendant responds: denied for lack of knowledge or information.

46. Denied for lack of knowledge or information.

47. Denied for lack of knowledge or information.

48. Denied for lack of knowledge or information.

49. As to the allegations contained in paragraph 49 of the Complaint, it is admitted that the plaintiff filed a police report against the defendant.

Except as herein admitted, denied for lack of knowledge or information.

50. Denied for lack of knowledge or information.

51. Denied for lack of knowledge or information.

52. Denied for lack of knowledge or information.

53. Denied for lack of knowledge or information.

54. Denied for lack of knowledge or information.

55. Denied for lack of knowledge or information.

56. Denied for lack of knowledge or information.

57. Denied for lack of knowledge or information.

58. Denied for lack of knowledge or information.

59. Denied for lack of knowledge or information.

60. Denied for lack of knowledge or information.

61. Denied for lack of knowledge or information.

62. Denied for lack of knowledge or information.

63. Denied for lack of knowledge or information.

64. Denied for lack of knowledge or information.

65. Denied for lack of knowledge or information.

66. Denied for lack of knowledge or information.

67. The defendant hereby repeats, re-alleges and incorporates by reference each of his responses to paragraphs 1 through 66 of the Complaint with like effect as if set forth fully herein.

68. Denied for lack of knowledge or information.

69. Denied for lack of knowledge or information.

70. Denied for lack of knowledge or information.

71. Denied for lack of knowledge or information.

72. Denied for lack of knowledge or information.

73. Denied for lack of knowledge or information.

74. Denied for lack of knowledge or information.

75. Denied for lack of knowledge or information.

76. Denied for lack of knowledge or information.

77. Denied for lack of knowledge or information.

78. The defendant hereby repeats, re-alleges and incorporates by reference each of his responses to paragraphs 1 through 77 of the Complaint with like effect as if set forth fully herein.

79. Denied for lack of knowledge or information.

80. Denied for lack of knowledge or information.

81. The allegations against defendant Young are denied.

Except as herein admitted, denied for lack of knowledge or information.

82. Denied.

83. Denied for lack of knowledge or information.

84. Denied.

85. The allegations against defendant Young are denied.

Except as herein admitted, denied for lack of knowledge or information.

86. Denied for lack of knowledge or information.

87. Denied.

88. The defendant hereby repeats, re-alleges and incorporates by reference each of his responses to paragraphs 1 through 87 of the Complaint with like effect as if set forth fully herein.

89. Admitted.

90. Denied for lack of knowledge or information.

91. Denied for lack of knowledge or information.

92. Denied for lack of knowledge or information.

93. Denied for lack of knowledge or information.

94. Denied for lack of knowledge or information.

95. Denied for lack of knowledge or information.

96. Denied for lack of knowledge or information.

97. Denied for lack of knowledge or information.

98. Denied for lack of knowledge or information.

99. The defendant hereby repeats, re-alleges and incorporates by reference each of his responses to paragraphs 1 through 98 of the Complaint with like effect as if set forth fully herein.

100. Denied for lack of knowledge or information.

101. Denied for lack of knowledge or information.

102. Denied for lack of knowledge or information.

103. Denied for lack of knowledge or information.

104. Denied for lack of knowledge or information.

105. Denied for lack of knowledge or information.

106. The defendant hereby repeats, re-alleges and incorporates by reference each of his responses to paragraphs 1 through 105 of the Complaint with like effect as if set forth fully herein.

107. Denied for lack of knowledge or information.

108. Denied for lack of knowledge or information.

109. Denied for lack of knowledge or information.

110. Denied for lack of knowledge or information.

111. Denied for lack of knowledge or information.

112. Denied for lack of knowledge or information.

113. The defendant hereby repeats, re-alleges and incorporates by reference each of his responses to paragraphs 1 through 112 of the Complaint with like effect as if set forth fully herein.

114. Denied for lack of knowledge or information.

115. Denied for lack of knowledge or information.

116. Denied for lack of knowledge or information.

117. Denied for lack of knowledge or information.

118. Denied for lack of knowledge or information.

119. Denied for lack of knowledge or information.

120. Denied for lack of knowledge or information.

121. Denied for lack of knowledge or information.

122. The defendant hereby repeats, re-alleges and incorporates by reference each of his responses to paragraphs 1 through 121 of the Complaint with like effect as if set forth fully herein.

123. Admitted.

124. Denied for lack of knowledge or information.

125. The allegations against defendant Young are denied.

Except as herein admitted, denied for lack of knowledge or information.

126. Denied for lack of knowledge or information.

127. The allegations against defendant Young are denied.

Except as herein admitted, denied for lack of knowledge or information.

128. Denied for lack of knowledge or information.

129. Denied for lack of knowledge or information.

130. Denied for lack of knowledge or information.

131. The defendant hereby repeats, re-alleges and incorporates by reference each of his responses to paragraphs 1 through 130 of the Complaint with like effect as if set forth fully herein.

132. The allegations against defendant Young are denied.

Except as herein admitted, denied for lack of knowledge or information.

133. Denied for lack of knowledge or information.

134. The allegations against defendant Young are denied.

Except as herein admitted, denied for lack of knowledge or information.

135. Denied for lack of knowledge or information.

136. Denied for lack of knowledge or information.

137. Denied for lack of knowledge or information.

138. Denied for lack of knowledge or information.

139. Denied for lack of knowledge or information.

140. The defendant hereby repeats, re-alleges and incorporates by reference each of his responses to paragraphs 1 through 139 of the Complaint with like effect as if set forth fully herein.

141. Denied.

142. Denied.

143. Denied.

144. Denied.

145. Denied.

FURTHER ANSWERING THE COMPLAINT OF THE PLAINTIFF AND AS A FIRST FURTHER AFFIRMATIVE DEFENSE AND PLEA OF THE STATUTE OF LIMITATIONS, THE DEFENDANT AVERS:



1. Upon information and belief, all of the plaintiff's claims against defendant Young are barred by the applicable statute of limitations, pursuant to N.G.G.S. § 1-52.

FURTHER ANSWERING THE COMPLAINT OF THE PLAINTIFF AND AS A SECOND FURTHER AFFIRMATIVE DEFENSE, THE DEFENDANT AVERS:

1. Defendant Young incorporates, by reference, all defenses pled or to be pled by any other answering party to this action.

FURTHER ANSWERING THE COMPLAINT OF THE PLAINTIFF AND AS A THIRD FURTHER AFFIRMATIVE DEFENSE, THE DEFENDANT AVERS:

1. The defendant reserves the right to amend his Answer to assert further defenses that are developed in discovery.

**WHEREFORE**, having answered the Complaint of the plaintiff, defendant Young prays that the plaintiff have and recover nothing of him in this action and that this action against him be dismissed with prejudice; that a trial by jury be had on all issues raised by the pleadings in this case; that the costs of this action be taxed against the plaintiff; and that the Court grant unto defendant Young such other and further relief as to the Court may seem just and proper.

This the 27<sup>th</sup> day of November, 2019.

/s/ Stephanie W. Anderson  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Answer of Kelly Young Only to Amended Complaint was served upon all counsel of record by U.S. First-Class Mail, postage prepaid, and addressed as follows:

Ms. Catharine E. Edwards  
Edwards Kirby, LLP  
3201 Glenwood Avenue, Suite 100  
Raleigh, NC 27612  
Attorney for Plaintiff

This the 27<sup>th</sup> day of November, 2019.

/s/Stephanie W. Anderson  
Attorney for Defendant Kelly Young  
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